

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ALEXIS KARLE AND PAUL JONES,

Plaintiffs,

v.

CIVIL ACTION NO. 3:15-cv-30095-MGM

STELLAR RECOVERY INC., I.C. SYSTEM
INC., CREDIT CONTROL SERVICES INC.,
DIVERSIFIED CONSULTANTS INC.,
ENHANCED RECOVERY SYSTEMS,
TMOBILE, LIFEWATCH, INC. d/b/a
LIFEWATCH USA,

Defendants.

**MEMORANDUM OF DIVERSIFIED CONSULTANTS, IN RESPONSE TO
CO-DEFENDANTS' MOTIONS FOR DISMISSAL/JUDGMENT ON THE PLEADINGS,
AND IN SUPPORT OF DIVERSIFIED'S PENDING MOTION TO DISMISS**

Pursuant to Fed. Rules Civ. P. 10(c) and 12(c), and the interests of judicial economy and efficiency, the defendant Diversified Consultants, Inc. ("DCI"), files this Memorandum in response to the motions of its co-defendants for dismissal/judgment on the pleadings and in support of DCI's pending motion to dismiss the First Amended Complaint. DCI joins in and incorporates by reference the authorities and arguments in the memoranda of law filed by the defendants T-Mobile USA, Inc., Credit Control Services, Inc., Stellar Recovery, Inc., and I.C. System, Inc. in support of their motions to dismiss and for judgment on the pleadings. For the reasons given by DCI in its motion and in the incorporated motions, the Amended Complaint should be dismissed.

DIVERSIFIED CONSULTANTS, INC.

By their attorney,

/s/ John J. O'Connor
John J. O'Connor
B.B.O. #555251
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Dated: October 20, 2015.

CERTIFICATE OF SERVICE

I, John J. O'Connor, hereby certify that I have, this 20th day of October, 2015, served the foregoing document by causing a copy thereof to be sent electronically to the registered participants in this case, if any, as identified on the Notice of Electronic Filing (NEF) and to be served by First-Class Mail Postage Prepaid to the following:

Paul Jones
572 Park Street
Stoughton, MA 02072

Alexis Karle
79 Thompson Street
Springfield, MA 01109

/s/ John J. O'Connor
John J. O'Connor

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